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October 11, 1991

Mr. Martin Hestmark  
U.S. Environmental Protection Agency  
Region VIII  
999 18th Street, Suite 500, 8WM-C  
Denver, Colorado 80202-2405



RE: Final Phase I RFI/RI Work Plan for OU 6, Walnut Creek Priority  
Drainage, September, 1991

Dear Mr. Hestmark,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), has reviewed the above referenced document prepared by DOE and it's prime operating contractor, EG&G. Based upon our review of the revised document and upon DOE's response to the Division's comments to the draft version, we cannot recommend immediate approval of this workplan.

This workplan has two significant problems. First, the conceptual model presented, being very simplistic, cannot and has not been used to design a sampling plan that completely and comprehensively addresses the pathways that will be evaluated in the Baseline Risk Assessment. It is the Division's position that the conceptual model warrants a major expansion to enable the sampling plan to collect all needed data.

The Division has performed a preliminary pathways analysis to more clearly determine the completeness of the sampling and analytical plans. The attached comments include recommendations for additional or revised sampling plans, and where appropriate, additional analytical suites. These comments should be used by DOE to gain insight into plan deficiencies. DOE should then perform a rigorous analysis of the pathways, comparable to the one prepared for OU 3 (Offsite Areas), to ensure completeness of the sampling plan.

The second major shortfall in the workplan is it's inability to satisfy the minimum requirements for a Phase I investigation as outlined in sections VI and VII of the IAG Statement of Work. DOE has acknowledged, in this work plan, that characterization of nature and extent of contamination is an objective of this Phase I

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RFI/RI. However, it is the Division's position that this work plan does not represent a complete Phase I investigation. DOE has delayed sampling and characterization efforts that would be required to meet the plan's objectives.

The Division recognizes that this operable unit is complex. However, a careful analysis of each IHSS should allow DOE, based on initial findings of the investigation, to develop a staged approach within the Phase I RFI/RI process. In so doing, more work could be accommodated in a single work plan and allow the regulatory agencies to perceive the overall investigation strategy being proposed by DOE.

If you have any questions regarding these matters, please call Harlen Ainscough of my staff at 331-4977.

Sincerely,



Gary W. Baughman  
Unit Leader, Hazardous Waste Facilities  
Hazardous Materials and Waste Management Division

cc: Frazer Lockhart, DOE  
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